

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

NYEISHA S. GHEE,

Plaintiff,

v.

Civil Action No.: 3:25-cv-17-RCY

PINETREE APARTMENTS, LLC,

Defendant.

JOINT MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER

COMES NOW Plaintiff Nyeisha S. Ghee (“Plaintiff”), by counsel, and Defendant Pinetree Apartments, LLC (“Defendant”), by counsel, and jointly move this Court for entry of a Protective Order Governing Confidential Materials, attached to this Motion as “Exhibit 1,” stating the following in support:

1. The parties may be required to produce or disclose confidential documents or things in the course of discovery in this case.
2. Entry of the proposed attached Order Governing Confidential Materials will facilitate the orderly and cost-effective discovery of relevant information.
3. The parties have met and conferred, and are mutually agreeable to all terms of the attached Order.

WHEREFORE, for the foregoing reasons, the parties jointly move this Court for entry of a Protective Order Governing Confidential Materials, attached to this Motion as “Exhibit 1.”

This 16th day of September, 2025.

PINETREE APARTMENTS, LLC

By: /s/ Kevin M. Kennedy
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NYEISHA GHEE

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CERTIFICATION

I hereby certify that on this 16th day of September, 2025, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Kevin M. Kennedy

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